

PALMER BIEZUP & HENDERSON LLP

By: Michael B. McCauley (Pa. 31748)

Daniel H. Wooster (Pa. 91180)

620 Chestnut Street

956 Public Ledger Building

Philadelphia, PA 19106-3409

(215) 625-9900

(215) 625-0185 (fax)

mccauley@pbh.com

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PONTIAKI SPECIAL MARITIME ENTERPRISE,)	
)	
Plaintiff,)	NO. 10-cv-_____
)	
v.)	
)	IN ADMIRALTY
SUN INTERNATIONAL LTD.,)	
)	
Defendant.)	

COMPLAINT

Pontiaki Special Maritime Enterprise ("Plaintiff"), by its attorneys Palmer Biezup & Henderson LLP, files this complaint against Sun International Ltd. ("Defendant") and avers as follows:

1. Plaintiff is a limited company organized and existing under the laws of Greece and having a principal place of business at 4-6 Filellinon Street, 185 36 Piraeus, Greece.
2. Defendant, a subsidiary of Sunoco, Inc., is an entity organized and existing under the laws of Bermuda.

3. This is an admiralty or maritime claim under Federal Rule of Civil Procedure 9(h) for breach of a vessel charter party and is a case over which this Court has admiralty and maritime jurisdiction pursuant to 28 U.S.C. § 1333(1).

4. Venue lies in this district pursuant to the general maritime law and a forum selection clause by which Plaintiff and Defendant agreed that this Court would be the forum and venue for litigation arising out of the charter party at issue.

5. On or about May 22, 2009, the parties entered into a charter party by which Plaintiff, as owner, agreed to let and Defendant, as charterer, agreed to hire the Motor Tanker NAUTILUS for a voyage from West Africa to the United States in accordance with the terms and conditions of the charter party.

6. Plaintiff has duly performed its obligations under the charter party.

7. Defendant has breached the charter party by failing, despite repeated demand, to pay Plaintiff demurrage in the amount of \$293,287.50 that is due and owing under the terms of the charter party.

WHEREFORE, Plaintiff prays that this Honorable Court enter a judgment in Plaintiff's favor and against Defendant in an amount not less than \$293,287.50, together with pre-judgment interest, costs, and attorneys' fees, and such further relief as may be proper.

Respectfully submitted,

PALMER BIEZUP & HENDERSON LLP

Date: July 9, 2010

By: 

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